

YORAM NACHIMOVSKY, PLLC  
299 BROADWAY, SUITE 605  
NEW YORK, NY. 10007

(212) 267-1157  
212-267-1199 (FAX)

NYBIZLAW@AOL.COM

**VIA ECF**

Alan Nisselson, Esq.  
c/o Windels Marx Lane & Mittendorf LLP  
156 West 56th Street  
New York, NY 10019

**Re: Luba Katz, Chapter 7  
Bankruptcy Petition #: 1-16-42281-nhl**

Dear Mr. Nisselson,

Our office was recently retained to represent Meir Katz, one of the priority creditors of this bankruptcy estate. Our client intends to file claims against the bankruptcy estate arising out of the separation agreement with the Debtor which was subsequently incorporated into a divorce decree. Specifically, the Debtor has been renting one or more apartments at 59 Lynbrook Avenue, Staten Island, New York without distributing to our client the portion of this income he is entitled to without contributing said funds toward mortgage.

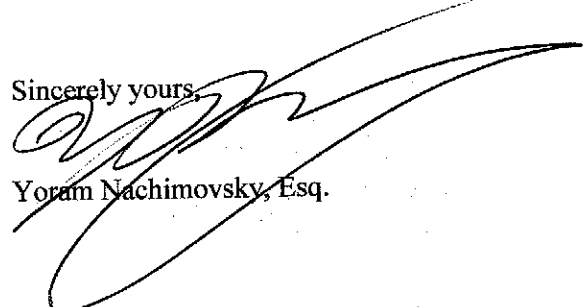
The Debtor has failed to pay the mortgage resulting in losses to the priority creditor in forms of increased fees, reduction of equity as well as legal fees. These losses are continuing to increase.

We recently learned that the 341(a) meeting in this case is scheduled for 7/6/2016. The details of the Debtor's rental history is of great importance to determining the size of the claim and can only be obtained at that meeting. Unfortunately, both attorneys admitted to EDNY are previously engaged on two separate matters on that date.

We respectfully request that the 341 (a) meeting be adjourned until the next available date so as to allow our office to send in an attorney to the creditor's meeting or, in the alternative, abstain from closing the meeting so that we can ask the Debtor questions on behalf of our client.

Thank you for your attention and consideration

Sincerely yours,

  
Yoram Nachimovsky, Esq.

cc: Todd Cushner, Esq., Garvey Tirelli & Cushner, Ltd. (attorneys for Debtor, via ECF)